

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

EDWARD SHAMOON, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

GENERAL MOTORS COMPANY,
MARY T. BARRA, and PAUL A.
JACOBSON,

Defendants.

CIVIL ACTION

No. 4:23-cv-13132-SDK-EAS

**STIPULATION AND ORDER CONFIRMING SERVICE OF PROCESS
AND EXTENDING TIME TO RESPOND TO COMPLAINT**

The parties have conferred and jointly submit the following stipulation and proposed order:

On December 8, 2023, plaintiff Edward Shamoon, individually and on behalf of all others similarly situated, filed a putative securities class action complaint in the above-captioned action (the “Action”) against defendants General Motors Company, Mary T. Barra, and Paul A. Jacobson (collectively, “Defendants”). This putative class action asserts federal securities claims arising under the Securities Exchange Act of 1934 and governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”). *See* 15 U.S.C. § 78u-4 *et seq.* Defendants hereby accept service of process through counsel listed below.

The PSLRA provides a procedure for the appointment by the Court of a lead plaintiff and lead counsel to represent the putative class pursuant to approval by the Court. *See 15 U.S.C. § 78u-4(a)(3).* Lead plaintiff and lead counsel will not be appointed until the Court rules on an application to serve as lead plaintiff, and, accordingly, it is unclear at this time who will ultimately have the authority to act on behalf of plaintiff and the putative class, and whether the Court-appointed lead plaintiff will file an amended complaint, a consolidated complaint, or rely on the existing complaint filed herein.

No party has previously requested or received time for an extension to answer or otherwise respond to the complaint in the Action. In the interest of efficiency, and in order to avoid unnecessary expense to the parties and unnecessary expenditure of time by the Court prior to the appointment of lead plaintiff and lead counsel and the filing of an amended complaint, a consolidated complaint, or the designation of an operative complaint, the parties propose the following schedule and process, subject to the Court's approval and order:

WHEREFORE, the parties jointly request that the Court enter an order that:

1. Undersigned counsel for Defendants are authorized to accept, and hereby do accept, service of the summons and complaint in this matter on behalf of Defendants, without prejudice and without waiver of any of Defendants' defenses, objections, or arguments, except as to sufficiency of service of process;

2. Defendants are not required to answer or otherwise respond to, and are hereby expressly relieved from answering or otherwise responding to, any complaints filed in this Action subject to the provisions of paragraphs 3 and 4 below;

3. The Court-appointed lead plaintiff shall have sixty (60) days after appointment to file an amended or consolidated complaint or, alternatively, to notify counsel for Defendants that a previously-filed complaint will serve as the operative complaint;

4. Defendants shall answer, move against, or otherwise respond to the operative complaint within sixty (60) days after the Court-appointed lead plaintiff (a) files an amended or consolidated complaint, or (b) designates a previously-filed complaint as the operative complaint;

5. The Court-appointed lead plaintiff shall have sixty (60) days to oppose any motions Defendants may file to dismiss the operative complaint; and

6. Defendants' replies shall be due forty-five (45) days after the filing of the Court-appointed lead plaintiff's opposition papers.

Dated: January 16, 2024

Respectfully submitted,

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman

J. Alexander Hood II

POMERANTZ LLP

600 Third Avenue, 20th Floor

New York, New York 10016
Tel: (212) 661-1100
Facsimile: (917) 463-1044
jalieberman@pomlaw.com
ahood@pomlaw.com

Attorneys for Plaintiff

/s/ Stephanie A. Douglas
Stephanie A. Douglas (P70272)
Roger P. Meyers (P73255)
BUSH SEYFERTH PLLC
100 W. Big Beaver Rd., Ste. 400
Troy, MI 48084
(248) 822-7800
douglas@bsplaw.com
meyers@bsplaw.com

/s/ Daniel J. Kramer
Daniel J. Kramer (*pro hac vice* forthcoming)
Andrew J. Ehrlich (*pro hac vice*
forthcoming)
Richard C. Tarlowe (*pro hac vice*
forthcoming)
Kristina A. Bunting (*pro hac vice*
forthcoming)
PAUL, WEISS, RIFKIND, WHARTON
&
GARRISON LLP
1285 Avenue of the Americas
New York, New York 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990
Email:dkramer@paulweiss.com
rtarlowe@paulweiss.com
aehrlich@paulweiss.com
kbunting@paulweiss.com

Attorneys for Defendants

SO ORDERED.

s/Shalina D. Kumar

Honorable Shalina D. Kumar
United States District Judge

Date: January 17, 2024